AUG 12 1999

Via Facsimile and Mail

Gwen Zervis, Project Manager
Bureau of Federal Case Management
Department of Environmental Protection
401 East State Street,
P.O. Box 028
Trenton New Jersey 08625

Re: EPA Comments on the Quarterly Monitoring Report - July 1999, Dayco/L.E. Carpenter Site, Wharton, New Jersey

Dear Ms. Zervis:

The United States Environmental Protection Agency (EPA) has reviewed the Quarterly Monitoring Report - July 1999, for the Dayco/L.E. Carpenter Site, Wharton, New Jersey, and has the following comments on the report.

The presentation of new and historical data strongly continues to suggest that the EFR remedy system should be reconsidered or supplemented. The reductions in LNAPL are extremely slow, and, although no concrete predictions are made as to the time frame of NAPL removal, it has become clear that EFR cleanup will continue for many years. During this time, the LNAPL will be a continuous source of dissolved contaminants to the groundwater, further increasing the overall cleanup time to restore impacted site groundwater. As outlined in EPA's May 20, 1999 letter from Carole Petersen to Bruce Venner of the New Jersey Department of Enviornmental Protection, there are other remedial options which would clearly speed the effort. A new Focused Feasibility Study for the LNAPL should be prepared which, at a minimum, considers technologies as Multiphase Extraction, LNAPL collection trenches, and technologies that would enhance LNAPL mobility.

Regarding groundwater sampling, EPA Region 2 has adopted a low flow sampling protocol which, in general, gives more accurate results than evacuating three well volumes of water. The use of bailers to collect samples has also been shown to yield results that are more variable and often under estimate Volatile Organic Compound (VOC) concentrations. A copy of EPA's Region 2 Low Flow Protocol can be forwarded to your attention, if needed. These methods should be employed starting with the next sampling round.

In several places in the report it is asserted that there are overall decreasing trends in LNAPL thickness and contaminant concentrations. Such bold statements are not supported. As mentioned above, EPA previously commented that a decent effort should be made to estimate remaining product volume. A number of reasonable tests could be applied to the data in order to evaluate the statistical certainty of a trend. The data in Appendix E, for example, could undergo such analysis. Given the current presentation, a strong case could be made that, in fact, levels are increasing at certain monitoring points. Quantifiable trend analyses for all well data (and product thickness data to address measurement issues) would be an objective assessment, and should be included in the next quarterly report.

The text states that well MW-11D will be added to the sampling program and analyzed for DEHP. This sample should also be analyzed for VOC's as the same mechanisms which are responsible for the potential presence of DEHP could also transport other contaminants.

Finally, considering the drainage channel adjacent to the site, it is recommended that this channel be resampled. Although the Remedial Investigation (RI) indicated only low levels of contamination were found in the channel, it has been over five years since the RI, and the possibility exists that with LNAPL in site groundwater, discharge to the channel could have increased, rather that decreased or stayed the same.

If you have any questions or comments on this matter, please feel free to call me at (212) 637-4411. Thank you for providing the opportunity to review this report.

Yours truly,

Stephen Cipot, Remedial Project Manager
Southern New Jersey Remediation Section

cc: Andy Crossland, PSB
Kimberly O'Connell, SNJRS

bcc: Stephen Cipot, SNJRS